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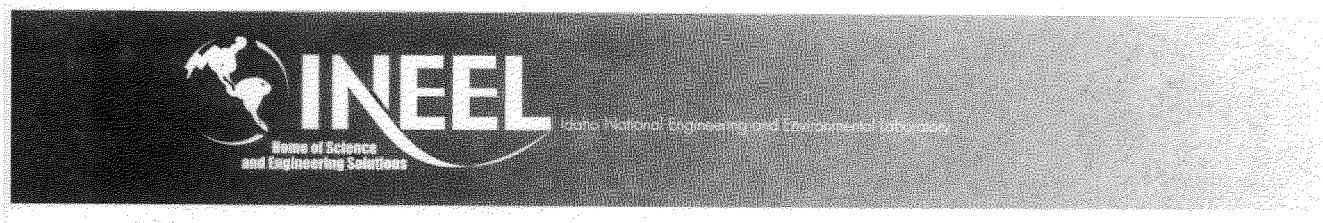
Idaho National Engineering and Environmental Laboratory Sitewide Five-Year Review Plan for CERCLA Response Actions



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Idaho National Engineering and Environmental Laboratory Sitewide Five-Year Review Plan for CERCLA Response Actions

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Prepared for the
U.S. Department of Energy
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ABSTRACT

This plan establishes the process for the completion and presentation of a Sitewide Five-Year Review at the Idaho National Environmental and Engineering Laboratory (INEEL) as part of the Idaho Completion Project. The review will be conducted to meet the statutory mandate under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) § 121 or as a matter of Environmental Protection Agency (EPA) policy. The basis for these instructions is derived from the EPA *Comprehensive Five-Year Review Guidance* document.

Five-year reviews are conducted to evaluate the protectiveness of the selected remedy or remedies required by the individual records of decision. The five-year review provides a summary history of site background, contamination, and remediation. A review of each remedy's requirements and all applicable or relevant and appropriate requirements is also completed to determine the protectiveness of the selected remedy.

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ACRONYMS

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFLUP	Comprehensive Facility and Land Use Plan
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
ESD	explanation of significant differences
IC	institutional control
IDEQ	Idaho Department of Environmental Quality
INEEL	Idaho National Engineering and Environmental Laboratory
LTS	long-term stewardship
NPL	National Priorities List
OU	operable unit
ROD	record of decision
RWMC	Radioactive Waste Management Complex
WAG	waste area group

TERMS/DEFINITIONS

CERCLA decision document. Refers to action memorandums, RODs, ROD amendments, and ESDs.

CERCLA explanation of significant differences (ESD). A document explaining a significant change to a remedial action selected in a CERCLA ROD.

CERCLA record of decision (ROD). Official document presenting the selected decision for a remedial action. A ROD also documents a federal agency decision made on an environmental impact statement.

CERCLA ROD amendment. Documents a fundamental change to a remedial action in a previously issued ROD.

CERCLA site. For the purposes of this document, a site requiring institutional controls (ICs).

Institutional control (IC). The EPA defines ICs as non-engineered instruments, such as administrative and/or legal controls, that help to minimize the potential for human exposure to contamination and/or protect the integrity of a remedy. ICs work by limiting land or resource use and/or by providing information that helps modify or guide human behavior at the site. Some common examples of ICs include zoning restrictions, building or excavation permits, well drilling prohibitions and easements and covenants.

National Priorities List (NPL). A list, maintained by the U.S. Environmental Protection Agency, of uncontrolled hazardous waste sites that have releases of, or could release, hazardous substances to the environment and are subject to CERCLA.

Operable unit (OU). A waste area group (WAG) subset that is a potential source area to be investigated and/or remediated.

Policy Five-Year Review. A pre- or post-SARA remedial action that, upon completion, will not leave hazardous substances, pollutant, or contaminants on site above levels that allow for unlimited use and unrestricted exposure, but requires five years or more to complete. A pre-SARA remedial action that leaves hazardous substances, pollutants, or contaminants on site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

Statutory Five-Year Review. A CERCLA required five-year review of a post-SARA remedial action that, upon completion, will leave hazardous substances, pollutants or contaminants on site above UU/UE levels.

Waste area group (WAG). The INEEL NPL site is divided into operational facility (geographic) areas WAGs to facilitate environmental remediation, with the exception of WAG 10; WAG 10 includes areas not in the other WAGs plus the Snake River Plain Aquifer.

Idaho National Engineering and Environmental Laboratory Sitewide Five-Year Review Plan for CERCLA Response Actions

1. INTRODUCTION/PURPOSE

The Federal Facility Agreement and Consent Order (DOE-ID 1991) states that ". . . U.S. DOE agrees that U.S. EPA may review response action(s) for Operable Units (OUs) that allow hazardous substances to remain on-site, no less often than every five (5) years after the initiation of the final response action for such OU to assure that human health and the environment are being protected by the response action being implemented." Guidance in the FFA/CO does not require the five-year review report to be either a primary or secondary document. Five-year reviews are also mandated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9601 et seq. 1980). On November 9, 2002, the U.S. Environmental Protection Agency (EPA) and the Idaho Department of Environmental Quality (IDEQ) approved and issued the record of decision (ROD) for Waste Area Group (WAG) 10 Operable Unit (OU) 10-04 (DOE-ID 2002a) at the Idaho National Engineering and Environmental Laboratory (INEEL). This ROD requires a sitewide approach to conducting the five-year reviews. The U.S. Department of Energy (DOE) Idaho Operations Office prepared this plan to include those CERCLA WAGs and OUs under direct control of the DOE. As of March 1, 2004, this plan excludes WAGs 8 and 9. DOE may revise this plan at a later date to include the institutional controls (ICs) for WAGs 8 and/or 9.

The five-year reviews at the INEEL Site are based on guidance in the *Comprehensive Five-Year Review Guidance* (EPA 2001), and the *CERCLA Five-Year Review Guide* from the Office of Environmental Management, U.S. Department of Energy, March 2002 (DOE 2002). A five-year review of remedial actions is generally required if, upon completion of the remedial actions, hazardous substances, pollutants, or contaminants will remain above levels that allow for unlimited use and unrestricted exposure, and the ROD for the site was signed on or after October 17, 1986.

The DOE has been the lead agency responsible for conducting five-year reviews at the INEEL Site and documenting the findings in a report. The EPA's primary responsibility with respect to five-year reviews at DOE sites is to review the DOE's evaluation and findings and, following their review, issue a finding of concurrence or nonconcurrence. Should a five-year review identify protectiveness concerns, the EPA will assist in evaluating appropriate corrective measures.

The INEEL was listed by the EPA on the National Priorities List (NPL) on November 21, 1989. Since that time, numerous RODs have been signed, implemented and in some cases, incorporated into comprehensive RODs. The INEEL Site is divided into waste area groups (WAGs) by function and geography. Refer to Figure 1 for the map showing the waste area groups at the INEEL Site. Operable units within the WAGs have further divided remediations at the WAGs. As remedial actions progress, comprehensive RODs have replaced previous RODs. Eventually, one comprehensive ROD will contain all remaining activities across the INEEL Site, and at present any new CERCLA sites that are identified are included in this final comprehensive ROD. This plan provides guidance to evaluate the protectiveness of the selected remedies established in the following CERCLA RODs:

WAG 1

- *Final Record of Decision for Test Area North, Waste Area Group 1 Operable Unit 1-10*, DOE/ID-10682, Rev. 0, October 1999.

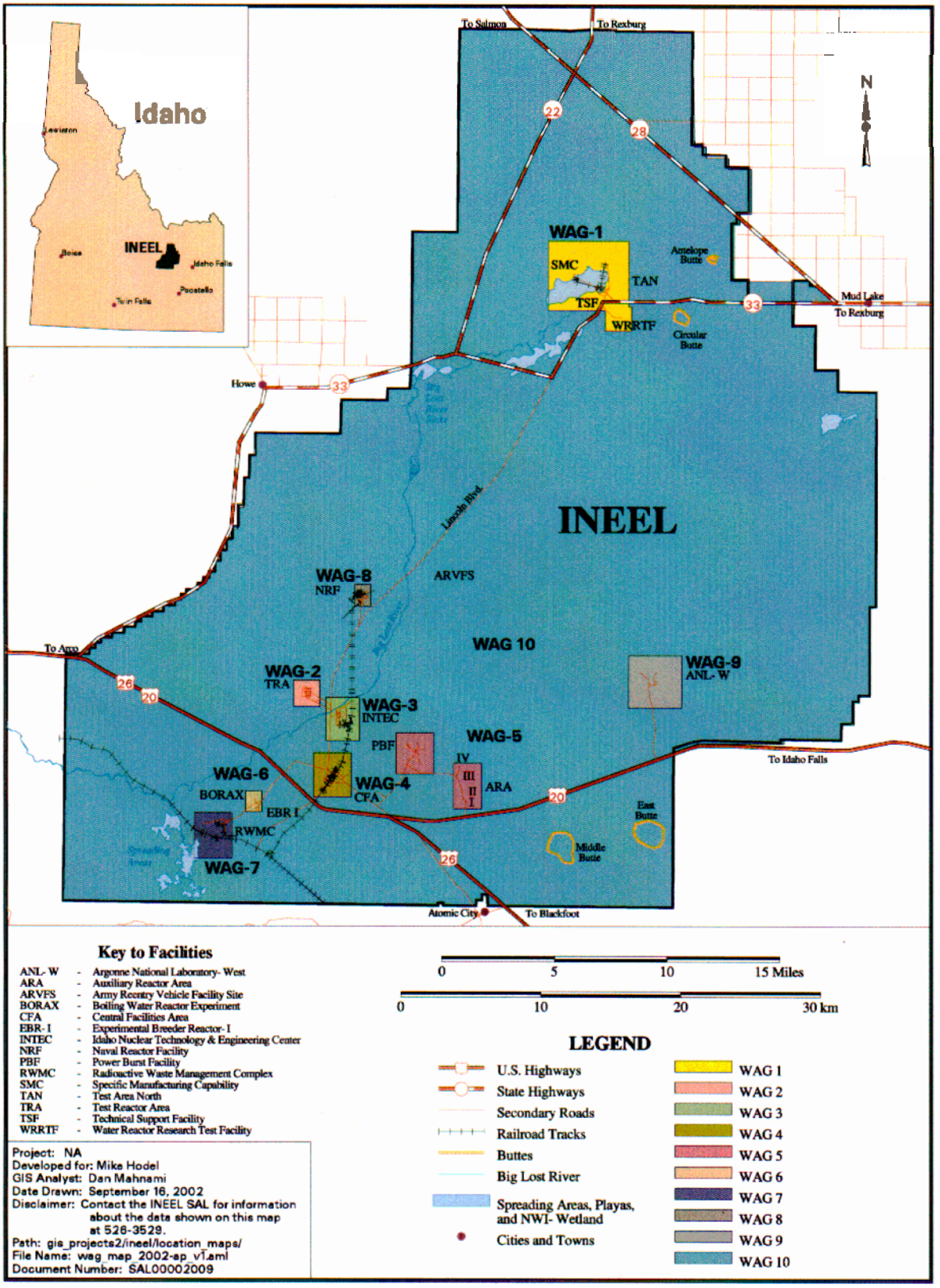

Figure 1. INEEL Site map showing WAG locations.

- *Record of Decision (ROD) for TSF-05 Injection Well and Surrounding Groundwater (GW) Contamination TSF-23 and Miscellaneous No Action Sites Final Remedial Action*, DOE/ID-10139, August 1995.

- *Explanation of Significant Differences for the Record of Decision for the Test Area North Operable Unit 1-10 ESD*, DOE/ID-11050, Rev. 0, April 2003.

- *Record of Decision (ROD) Amendment – Technical Support Facility Injection Well TSF-05 and Surrounding Groundwater Contamination TSF-23 and Miscellaneous No Action Sites, Final Remedial Action (RA)*, DOE/ID-10139 Amendment, September 2001.

WAG 2

- *Final Record of Decision Test Reactor Area, Waste Area Group 2, Operable Unit 2-13*, DOE/ID-10586, December 1997.

- *Explanation of Significant Differences to the Record of Decision for the Test Reactor Area Operable Unit 2-13*, DOE/ID-10744, Rev. 0, May 2000.

WAG 3

- *WAG 3 Final Record Of Decision, Idaho Nuclear Technology and Engineering Center, Waste Area Group 3 Operable Unit 3-13*, DOE/ID-10660, October 1999.

WAG 4

- *WAG 4 Final Comprehensive Record of Decision for Central Facilities Area Operable Unit 4-13*, DOE/ID-10719, Rev. 2, July 2000.

WAG 5

- *WAG 5 Record of Decision for Power Burst Facility Auxiliary Reactor Area (PBF/ARA) Operable Unit 5-12*, DOE/ID-10700, Rev. 0, January 2000.

WAGs 6 and 10

- *Record of Decision (ROD) for Experimental Breeder Rector I & Boiling Water Reactor Experiment Area (EBR-1/Borax) Operable Units (OU) 10-04 and 6-05 and Miscellaneous Sites*, DOE/ID-10980, Rev. 0, November 2002.

WAG 7

- *Record of Decision (ROD): Declaration for PAD-A at the Radioactive Waste Management Complex (RWMC) Subsurface Disposal Area (SDA)*, February 1994.

- *Record of Decision (ROD) for Organic Contamination in the Vadose Zone (OCVZ), RWMC, INEL*, December 1994.

- *Record of Decision (ROD) – Declaration for Pit 9 at the Radioactive Waste Management Complex (RWMC) Subsurface Disposal Area (SDA)*, October 1993.

WAG 8 (Not currently under DOE direction)

- *Final Record of Decision Naval Reactors Facility Operable Unit 8-08*, September 30, 1998

WAG 9 (Not currently under DOE direction)

- *Final Record of Decision Argonne National Laboratory – West*, September 29, 1998, W7500-000-ES-04

2. SCOPE

In accordance with the *Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Five-Year Review Guide* from the Office of Environmental Management, Department of Energy, March 2002 (DOE 2002), the five-year review should be used to:

1. Evaluate whether the remedy is operational and functional;

2. Evaluate those assumptions critical to the effectiveness of remedial measures or the protection of human health and the environment made at the time of the remedial decision to determine, given current information, whether these assumptions are still valid;

3. Determine what corrective measures are required to address any identified deficiencies; and

4. Evaluate whether there are opportunities to optimize the long-term performance of the remedy or reduce life-cycle costs.

Each of these primary focus areas is discussed in more detail below.

2.1 Operational and Functional Remedy

To evaluate whether a remedy is operational and functional, the decision document must be reviewed. The status of a remedial action must be compared to the ROD commitments in order to measure if human health and the environment are protected as intended. Implicit in any determination that a remedy is operating properly and successfully is the assumption that performance expectations/measures have been established. If no formal basis for assessing performance has been previously agreed to, one should be established and completed as a part of the first five-year review.

2.2 Validity of Assumptions

The five-year review is an opportunity to confirm the continuing validity of the critical assumptions made at the time of the remedial decision. As used here, a critical assumption is one that, if invalid, puts the protectiveness of the remedy in question. In general, critical assumptions are:

- Assumptions regarding future land use. These assumptions may require evaluation if areas are opened for less restricted uses, such as grazing or hunting, at some future time.

- Assumptions regarding site conditions. A number of assumptions about site conditions are made in the process of determining a selected remedy. Actual site conditions may vary from the assumed site conditions. Whether an assumption about site conditions is critical will depend on the degree to which the remedy performance is based on that assumption.

- Assumptions regarding contaminant toxicity. Modification to a toxicity value or methodology or changes in regulatory standards may result in the need to revisit previous risk calculations to ensure no unacceptable risks are posed to human health and the environment.

- Other assumptions if applicable.

2.3 Corrective Measures to Address Identified Deficiencies

As stated in the Federal Facility Agreement and Consent Order, "If upon such (five-year) review it is the judgment of U.S. EPA, after consultation with IDHW, that additional action or modification of the response action is appropriate . . . U.S. EPA and IDHW may require U.S. DOE to implement such Additional Work pursuant to Part XV." The level of effort required for determining the appropriate corrective measure for an identified deficiency will depend on the significance of the deficiency. In general, a deficiency is insignificant if it does not raise substantive protectiveness concerns and the required fix does not entail changing the nature of the remedy. Examples of insignificant deficiency include a missing warning sign, plant growth on a surface barrier, or cap erosion noted. A significant deficiency exists when there is a substantive concern about the protectiveness of the remedy. Examples of significant deficiencies include, but are not limited to, the following:

- A containment cell is leaking and monitoring shows that containments are leaching to the ground water.
- Actual site conditions, discovered through monitoring for natural attenuation remedy, are different than originally assumed and the ground water plume is migrating.
- Residential homes are under construction on lands designated for recreational use only.

If deficiencies that do not directly impact the protectiveness of the remedy are found during the 5-year review, project managers may identify and implement the appropriate action without formal consultation with overseeing agencies and simply report on the action taken.

2.4 Remedy Optimization

Optimizing a remedy may include measures to improve the performance of the remedy or measures to reduce associated monitoring, sampling, or maintenance costs. During the 5-year review, it may be determined that institutional controls are no longer needed at some sites, for example. For long-term remedial actions, managers, with agency concurrence, should evaluate whether enhancements to the remedy can be implemented that would expedite the attainment of the remedial objectives and if they are cost effective. In some situations, new technologies may become available that allow environmental contamination to be remediated in a manner not possible at the time the remedy was selected.

As confidence grows that a remedy is performing as expected, the remedy may be optimized by scaling back the frequency, location, or scope of monitoring that may no longer be necessary as uncertainties are reduced. For example, if a "pump and treat" remedy has been implemented to control a ground water plume, some monitoring wells may become unnecessary, as they no longer register contamination levels above cleanup levels after the plume has contracted. Under these circumstances, the sampling plan should be revised to eliminate these wells from the sampling routine or reduce the frequency of their sampling. It also may be possible to remove specific ground water extraction wells from service and increase the pumping rate in others to optimize ground water remediation.

3. METHODOLOGY OF SITEWIDE FIVE-YEAR REVIEW

Management Control Procedure (MCP)-1302, "INEEL – Five-Year Review for CERCLA Response Actions," provides instructions for conducting a five-year review at the INEEL Site. This MCP guides the process from establishing a review team, notifying the community, establishing schedules, and gathering data through reporting and communicating results.

The intent of this sitewide plan is to provide guidance in performing five-year reviews consistently and efficiently across the INEEL Site, thereby realizing cost savings. WAGs that have not participated previously in a five-year review will act as lead over review activities at that WAG during the first sitewide five-year review. Assistance from Long-Term Stewardship will be provided if requested. Sitewide five-year reviews will be reported under the direction of the DOE Idaho Operations Office by the Long-Term Stewardship Program.

The Sitewide review at the INEEL will cover multiple remedies and operable units, both active and inactive. The status and progress of each site in the CERCLA cleanup process will be considered. Generally, the sites can be sorted into four general categories listed below in Section 3.1, through 3.4, according to each site's progress through the CERCLA cleanup process. The four focus areas discussed in Section 2 are applied to these categories. While the five-year review will be reported on a WAG basis, all CERCLA sites across the INEEL can be sorted into the four categories below.

3.1 No Action Sites

Sites that have progressed through the CERCLA investigation phase and are closed without implementing any remedial action are categorized as No Action sites. Because these No Action sites are closed, they will not require evaluation in the five-year review.

3.2 Remedy Complete Sites

Remedy complete sites are sites on which:

- One or more of the CERCLA investigation phases has been completed
- A remedial decision was made
- The approved remedial action was taken
- Remediation is complete
- No hazards remain
- Institutional controls are not required.

Because the remedies are complete and these sites are closed, they will not require evaluation in the five-year review.

3.3 Sites with Functioning Remedy

Sites that fall into this category have progressed through one or more of the CERCLA investigation phases, a remedial decision was made, a remedial action was approved, and the remedial action is either awaiting implementation or is currently in progress. These sites remain active and will not be closed until the remedial actions are complete. Sites where active treatment is complete, but the land-use is restricted or other institutional controls remain in effect, will be included with sites that have functioning remedies for the purposes of the five-year report. Sites designated as No Further Action may be considered in this category if hazards remain and institutional controls are in place. Typically, these sites require no remedial activity, but are controlled pending the natural decay of radioactive contaminates.

Sites where remedies are functioning will be evaluated to determine if the remedy is functioning as intended (Section 2.1) and if there are any changes in exposure assumptions, toxicity data, cleanup levels, or remedial action objectives (Section 2.2); and if any other information has come to light that could call into question the protectiveness of the remedy (Section 2.3). These sites should also be evaluated in regards to remedy optimization (Section 2.4). The five-year review is the appropriate time to revise a site designation from No Further Action to No Action and remove institutional controls.

3.4 Sites Under Investigation

A review of new sites that are currently in one of the investigation phases of the CERCLA process can be deferred until investigations are complete, and a remedial decision is made. Details regarding these sites will be reported in the next five-year review.

4. DOCUMENTATION OF FINDINGS

Histories of the WAGs and associated data are contained in the Administrative Record, in post-decision document files, or LTS files; therefore, this information will not be duplicated in five-year review reports. Only a brief chronological history of each WAG (problems discovered, remedial action objectives, and remedies implemented) shall be prepared. Primarily, the five-year reports shall serve to summarize any substantive findings and conclusions reached from monitoring and maintenance activities complied over the previous five years, and any corrective measures taken or being recommended to address identified deficiencies.

The report of the five-year review is not designated as a primary or a secondary document in the Federal Facility Agreement and Consent Order. The report shall be compiled on a sitewide basis with subdivisions on each WAG.

5. TIMING OF REVIEWS

In accordance with the FFACO and EPA guidance, the date a remedial action is initiated in the field becomes the trigger for the five-year review clock. Refer to Table 1 for a listing of INEEL RODs, ESDs, approximate date of remedial actions, and dates of five-year reviews that have been performed.

It is recommended that a sitewide five-year review be performed during FY 2005. WAGs that have not participated previously in a five-year review will act as lead over review activities at that WAG during the first sitewide five-year review. Assistance from Long-Term Stewardship will be provided if requested. The 2005 review will be reported under the leadership of the Long-Term Stewardship Program with sections reporting from each WAG. The 2005 report will constitute the first five-year review for WAG 1, WAG 3, WAG 6/10, and WAG 7 (OCVZ), and the first five-year review under a comprehensive ROD for WAGs 4 and 5.

6. RELATIONSHIP TO OTHER REPORTING REQUIREMENTS/REVIEWS

To facilitate the coordination of reviews and reporting requirements, all data and related environmental reports shall be housed electronically in the Long-Term Stewardship project files at the INEEL. This includes data collected in support of five-year reviews, as well as those data collected for other reporting requirements such as RCRA post-closure permit requirements, annual environmental monitoring reports, and annual CERCLA inspection reports. This will promote consistency in the data and reports being released to the public and regulators. It will also optimize the monitoring and data collection and storage across all programs and minimize duplicative sampling and analysis.

Table 1. Schedule for five-year CERCLA reviews.

WAG	Operable Unit	ROD/ESD/ Amendment Date	Initiation of Remedial Action	Five-Year Review Completed	Mandated Date	Planned Date
WAG 1	OU 1-07B	1995/1997/2001	1995	—	2006	2005
	OU 1-10	1999	February 2001	—	February 2005	2005
WAG 2	OU 2-13	1997	December 97	August 2003	2008 (2nd Review)	2005
WAG 3	OU 3-13	1999	October 2000	—	October 2006	2005
	OU 3-14	Pending	—	—	—	—
WAG 4	OU 4-03 (Landfills)	1995	1996	November 2002	N/A	N/A
	OU 4-13 (Comprehensive includes OU 4-03)	2000	May 2002	—	2006	2005
WAG 5	OU 5-05 (SL-1 burial ground)	1995	1996	2001	N/A	N/A
	OU 5-12 (Comprehensive includes OU 5-05)	2000	June 2000	—	June 2005	2005
WAG 6/10	OU 6-05 and OU 10-04	2002	February 2004		November 2009	2005
WAG 7	OU 7-08 (OCVZ)	1994	1995	—	Unknown	2005
	OU 7-10 (Pit 9)	1993	Pending	—	—	—
	OU 7-12 (Pad A)	1994	1994	—	Unknown	2005
	OU 7-13/14	Pending	—	—	—	—

7. PUBLIC INVOLVEMENT

The public must remain fully informed of all on-going activities at the site, including, but not limited to, the schedule and scope of five-year reviews. Refer to the *Community Relations Plan,* for a guide to CERCLA public involvement at the INEEL. (DOE-ID 2004). A public notice of the DOE's intent to initiate a five-year review shall be prepared so interested parties may participate as appropriate. Once the reviews are complete, copies of the report shall be placed in appropriate information repositories.

If significant deficiencies are noted during in the five-year review, which require corrective measures, the public shall be involved. Should a five-year review identify the potential need to implement a previously identified contingency to correct a remedy failure, and that contingency was discussed in the original decision, it may be adequate to simply notify the public through an Explanation of Significant Difference (ESD) that the contingency plan is being implemented. However, if a review finds the original remedy is failing, and a new remedy is necessary, then those community participation requirements under which the original remedy was selected would be applicable to the selection of the new remedy. If the corrective measures identified in the five-year review address insignificant deficiencies, the actions shall be documented in the report and recorded in the files without public notification prior to taking the measures.

The *Idaho National Engineering and Environmental Laboratory Comprehensive Facility and Land Use Plan* (CFLUP) (DOE-ID 1997b) shall track, or include by reference, any permitting changes, renovation work on structures, well placement and drilling, construction, or other activities that could occur on INEEL CERCLA sites. The CERCLA module of the CFLUP is publicly available at http://cflup.inel.gov and is an important tool in communicating information within the INEEL and to the public. Data and results from the Sitewide five-year reviews will be incorporated into the CFLUP as needed.

8. REFERENCES

42 USC 9601 et seq., 1980, "Comprehensive Environmental Response, Compensation, and Liability Act of 1980," Public Law 96-510, as amended.

DOE, 2002, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Five-Year Review Guide*, Office of Environmental Management, U.S. Department of Energy, Washington, DC, http://www.em.doe.gov/er/Five_Year_Review_508.pdf, March 2002.

DOE-ID, 1991, *Federal Facility Agreement and Consent Order for the Idaho National Engineering Laboratory*, Administrative Docket No. 1088-06-120, U.S. Department of Energy Idaho Field Office, U.S. Environmental Protection Agency Region 10, and State of Idaho Department of Health and Welfare, December 9, 1991.

DOE-ID, 1993, *Record of Decision – Declaration for PIT 9 at the Radioactive Waste Management Complex Subsurface Disposal Area*, U.S. Department of Energy Idaho Operations Office, October 1993.

DOE-ID, 1994a, *Record of Decision: Declaration for PAD-A at the Radioactive Waste Management Complex Subsurface Disposal Area*, February, U.S. Department of Energy Idaho Operations Office, February 1994.

DOE-ID, 1994b, *Record of Decision: Declaration for Organic Contamination in the Vadose Zone (OCVZ), RWMC*, INEL, U.S. Department of Energy Idaho Operations Office, December 1994.

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DOE-ID, 1997a, *Final Record of Decision for Test Reactor Area, Operable Unit 2-13*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10586, December 1997.

DOE-ID, 1997b, *Idaho National Engineering and Environmental Laboratory Comprehensive Facility and Land Use Plan*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10154, December 1997. (Official Use Only)

DOE-ID, 1999a, *Final Record of Decision, Idaho Nuclear Technology and Engineering Center*, DOE/ID-10660, Rev. 0, U.S. Department of Energy Idaho Operations Office, U.S. Environmental Protection Agency, Idaho Department of Health and Welfare, October 1999.

DOE-ID, 1999b, *Final Record of Decision for Test Area North, Operable Unit 1-10,* DOE/ID-10682, Rev. 0, U.S. Department of Energy Idaho Operations Office, October 1999.

DOE-ID, 2000a, *Record of Decision for the Power Burst Facility and Auxiliary Reactor Area, Operable Unit 5-12*, DOE/ID-10700, Rev. 0, U.S. Department of Energy Idaho Operations Office, January 2000.

DOE-ID, 2000b, *Explanation of Significant Differences to the Record of Decision for Test Reactor Area Operable Unit 2-13*, DOE/ID-10744, Rev. 0, U.S. Department of Energy Idaho Operations Office, May 2000.

DOE-ID, 2000c, *Final Comprehensive Record of Decision for Central Facilities Area Operable Unit 4-13*, Department of Energy Idaho Operations Office, DOE/ID-10719, Rev. 2, July 2000.

DOE-ID, 2001, *Record of Decision Amendment- Technical Support Facility Injection Well (TSF-05) and Surrounding Groundwater Contamination (TSF-23) and Miscellaneous No Action Sites Final Remedial Action*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10139 Amendment, September 2001.

DOE-ID, 2002, *Record of Decision for Experimental Breeder Reactor I/Boiling Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Rev. 0, U.S. Department of Energy Idaho Operations Office, November 2002.

DOE-ID, 2003, *Explanation of Significant Differences for the Record of Decision for the Test Area North Operable Unit 1-10,* DOE/ID-11050, Rev 0, U.S. Department of Energy Idaho Operations Office, April 2003.

DOE-ID, 2004, *Community Relations Plan*, DOE/NE-ID-11149, Idaho Completion Project, February 2004.

EPA, 2001, *The Comprehensive Five-Year Review Guidance*, OSWER Directive 9355.7-03B-P, EPA 540-R-01-007, Office of Emergency and Remedial Response, U.S. Environmental Protection Agency, June 2001. (This replaces OSWER Directive 9355.7-02A, "Supplemental Five-Year Review Guidance," July 1994.)

MCP-1302, 2003, "INEEL – Five-Year Review for CERCLA Response Actions," Rev. 0, November 2003.